

EXHIBIT I

From: Katherine Rosenfeld
Sent: Monday, April 07, 2014 8:22 PM
To: Larkin, Arthur (Law); Nunez Plaintiffs' Counsel
Cc: Joyce, Kimberly (Law)
Subject: RE: Homer Venters' deposition

Per our earlier emails on this subject, it's important that the Venters deposition proceed on schedule, and certainly before the parties' planned settlement break week of May 12th. Scheduling depositions for the protected week of May 12th is counter to the purpose of that "break" week, which is to focus on settlement prospects for a given week between stages of discovery.

Dr. Venters' deposition has been noticed for months, the Court has ordered that it be conducted as part of Phase I, and it has already delayed by the City's tardy production of the Venters ESI - only scheduled to be completed today I understand. It is not reasonable to suggest that the deposition be conducted in 6 or 7 weeks from now, given our stated pending request to conduct it as soon as possible, and the importance of completing it before the May 12th settlement break. The purpose of the schedule was to give each side access to information that would aid in the settlement break process, and we need to follow that plan with respect to this important deposition.

You have not provided a reason for delaying this deposition, except to previously state that one lawyer on your team (you) has a trial scheduled for the week of April 28th. Since today is April 7th, that does not account for a proposal to conduct this deposition in mid-to-late May.

Please revisit your proposed dates in light of the above information that it's important to the discovery plan and the settlement break process that we conduct this deposition sooner rather than later, and particularly before May 12th. We can be available many days in April (including the week of April 21st), and May 1, 5, 6, and 7.

Thank you.

Katherine Rosenfeld
Emery Celli Brinckerhoff & Abady LLP

From: Larkin, Arthur (Law) [alarkin@law.nyc.gov]
Sent: Monday, April 07, 2014 6:25 PM
To: Nunez Plaintiffs' Counsel
Cc: Joyce, Kimberly (Law)
Subject: Homer Venters' deposition

Dr. Venters and defense counsel are available on the following dates for the deposition:

May 14-15
May 19-21-22

Please let us know when your side is available.

Arthur G. Larkin, Esq.
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